SUBJECT: Gulfco Marine Maintenance BHHRA comments

FROM: Dipanjana Bhattacharya, Risk Assessor

TO: Gary Miller, Remedial Project Manager

2.2 Page 10-13: IDENTIFICATION OF POTENTIAL CHEMICALS OF CONCERN

The discussion in Section 2.2 concerning the screening process is a little confusing. Maybe an included diagram would help clarify the process. This would save time and further confusion when the ROD is written.

3.1.2   Page 15: Groundwater Use and Pathway Evaluation

A clear and transparent discussion of the inhalation pathway is missing from the report. This needs to be included and discussed since VOCs, SVOCs, and metals are COIs. Depending on climate and temperature variations, volatilization of chemicals and release of metal dust can make the inhalation exposure route complete. This was mentioned in the comments to the Draft Nature and Extent Report. Maybe a reference can be made in the text so as to give a chain of transparent record for addressing this pathway.

There is a section stating "Thus, the only complete exposure pathway is the volatilization to indoor and outdoor air pathway in areas above impacted groundwater. A restrictive covenant requiring any building design to preclude vapor intrusion has been filed for Lots 55, 56, and 57 where VOC concentrations were measured in relatively high concentrations in Zone A groundwater. Nevertheless, this pathway was conservatively evaluated in the BHHRA."

Please expand on this, make references from the tables so the reader can follow the logic. Describe which COIs exceeded screening levels and the locations in reference to the residential and other potential receptor populations.

3.1.4   Page 16-17: Fish and Shellfish Resources and Pathway Evaluation

Please state in a clear manner as to why subsistence fishing was not considered for evaluation

**4.4	Page 29: SOURCES OF TOXICITY CRITERIA**

Please include some clarification as to use of Regional Screening Levels (RSLs).

**6.1	Page 34: DATA ANALYSIS UNCERTAINTIES**

Please include comparison to background in the uncertainty section.